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February 10, 2022

**VIA ECF**

The Honorable Richard J. Sullivan  
United States District Court  
Southern District of New York  
Thurgood Marshall United States Courthouse  
40 Foley Square, Room 2104  
New York, New York 10007

**Re: *Sun, et al. v. China 1221, Inc., et al.***  
**Index No. 12-cv-7135**  
**Request for adjournment of the deadline to file a joint letter outlining post-bankruptcy litigation**

Dear Judge Sullivan:

This firm represents the Defendants/Respondents in the above-referenced matter. We respectfully write, with Plaintiff's consent, to extend the deadline, from February 16, 2022 to February 23, 2022, to file a joint letter outlining the parties' plan to proceed now that China 1221, Inc.'s bankruptcy has concluded in accordance with the Court's February 8, 2022 Order (Dkt. # 311). The reason for the request is that the undersigned will be travelling internationally and will be away next week. This is the first request for an adjournment of this deadline. Please do not hesitate to contact me with any questions. As always, we appreciate the Court's attention to this matter.

Respectfully submitted,

Eli Z. Freedberg

The Defendants' request for an extension is GRANTED. IT IS HEREBY ORDERED THAT the parties shall file a joint letter by February 23, 2022, setting forth their proposed next steps in this matter.

So Ordered:  
Date: February 11, 2022

  
Richard J. Sullivan  
U.S.C.J., Sitting by Designation